

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

KRISTEN PIERSON,

Plaintiff,

v.

GOLOCALPROV, LLC, THE FENTON
GROUP, LLC, and CLOUDFLARE, INC.,

Defendants.

Case No. 1:22-CV-00219-WES-PAS

**NOTICE OF VOLUNTARY DISMISSAL
OF DEFENDANT CLOUDFLARE, INC.,
ONLY**

NOW COMES Plaintiff, Kristen Pierson, and, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), hereby gives notice of dismissal of Defendant Cloudflare, Inc., only.¹ Defendant Cloudflare, Inc., has neither served an answer to the Complaint nor a motion for summary judgment. This dismissal of Defendant Cloudflare, Inc., is without prejudice.

WHEREFORE, the claims against Defendant Cloudflare, Inc., in this action are hereby dismissed *without prejudice*.

Dated: June 21, 2022.

Respectfully Submitted,

/s/Sean M. McAteer

Sean M. McAteer, 4118

203 South Main Street

Providence, RI 02903

(401) 946-9200

Email: summerromance@verizon.net

¹ Rule 41(a)(1)(A)(i) permits dismissal of an action as to fewer than all defendants. *See Parker v. Wall*, No. 10-040 ML, 2010 U.S. Dist. LEXIS 116172, at *1-2 (D.R.I. Oct. 5, 2010); *see also Zuker v. Rodriguez*, No. 12-1408 (PAD), 2017 U.S. Dist. LEXIS 82321, at *25 (D.P.R. May 30, 2017) (“In a case with multiple defendants, voluntary dismissal of all claims against a single defendant is permitted”) and *Terry v. Pearlman*, 42 F.R.D. 335, 337 (D. Mass. 1967) (“a dismissal by notice under Rule 41(a)(1)(i) can be effective against less than all defendants.”) citing 5 Moore’s Federal Practice 1088.

/s/ Jay M. Wolman

Jay M. Wolman (*pro hac vice*)
RANDAZZA LEGAL GROUP, PLLC
100 Pearl Street, 14th Floor
Hartford, Connecticut 06103
Tel: (702) 420-2001
Email: ecf@randazza.com

Marc J. Randazza (*pro hac vice*)
RANDAZZA LEGAL GROUP, PLLC
30 Western Avenue
Gloucester, MA 01930
Tel: (702) 420-2001
Email: ecf@randazza.com

Attorneys for Plaintiff
Kristen Pierson

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 21, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

A courtesy copy has been sent to counsel for Cloudflare, Inc., this date, via electronic mail and first-class mail, postage prepaid, as follows:

Martina Radney, Esq.
Litigation Counsel
Cloudflare, Inc.
1401 K St., NW
Washington, DC 20005
martina@cloudflare.com

/s/ Jay M. Wolman

Jay M. Wolman